

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In the Matter of :

Chapter 11

Franchise Group, Inc., et al.,

Case No. 24-12480 (JTD)

Debtors.

Hon. John T. Dorsey

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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE**

PLEASE TAKE NOTICE that Alan J. Taylor of Segal McCambridge Singer & Mahoney appear as Attorney for **Creditor/Landlord, Brookdale Shopping Center, L.L.C.**, in the above action. The undersigned requests that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the undersigned at the following office address and telephone number:

Alan J. Taylor, Esq.  
Segal McCambridge Singer & Mahoney  
Attorney for Brookdale Shopping Center, L.L.C.  
29100 Northwestern Highway, Suite 240  
Southfield, MI 48034  
(248) 994-0060 (t) / (248) 994-0061 (f)  
*ataylor@smsm.com;*

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone facsimile or otherwise.

This Notice of Appearance and Request for Service shall not be deemed or construed to be a waiver of the rights of Brookdale Shopping Center, L.L.C. (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have the

District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) of any other rights, claims, actions, setoffs, or recoupments to which Boardwalk may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully Submitted,

SEGAL MCCAMBRIDGE SINGER & MAHONEY

By: /s/Alan J. Taylor  
Alan J. Taylor (P51660)  
Attorney for Brookdale Shopping Center L.L.C.  
29100 Northwestern Highway, Suite 240  
Southfield, MI 48034  
(248) 994-0060 (t) / (248) 994-0061 (f)  
*ataylor@smsm.com;*

Dated: December 13, 2024

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**PROOF OF SERVICE**

The undersigned states that on December 13, 2024, copies of the **Notice of Appearance and Request for Service** was electronically filed and served via CM/ECF on all parties that have entered an Appearance and requested service in the above-referenced action.

Respectfully Submitted,

SEGAL MCCAMBRIDGE SINGER & MAHONEY

By: /s/Graye Trevino  
Graye Trevino